

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	Chapter 11
SUNGARD AS NEW HOLDINGS, LLC, <i>et al.</i> ,	Case No. 22-90018 (CML)
Debtors. <sup>1</sup>	Jointly Administered
In re:	Case No. 23-00645 (EVR)
Professional Fee Matters Concerning the Jackson Walker Law Firm	

**WIND-DOWN DEBTORS' JOINDER TO UNITED STATES TRUSTEE'S  
AMENDED AND SUPPLEMENTAL MOTION FOR (1) RELIEF FROM  
JUDGMENT PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE  
60(b)(6) AND FEDERAL RULE OF BANKRUPTCY PROCEDURE 9024  
APPROVING THE RETENTION AND COMPENSATION APPLICATIONS  
OF JACKSON WALKER LLP, (2) SANCTIONS, AND (3) RELATED RELIEF**

The above-captioned debtors (before the Effective Date of the Plan,<sup>2</sup> the “**Debtors**,” and following the Effective Date of the Plan, the “**Wind-Down Debtors**”) in the above-captioned chapter 11 cases of Sungard AS New Holdings, LLC and its affiliates (the “**Sungard Chapter 11 Cases**”) hereby file their joinder (this “**Joinder**”) to the *Amended and Supplemental Motion for (1) Relief From Judgment Pursuant to Federal Rule of Civil Procedure 60(b)(6) and Federal*

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<sup>1</sup> The last four digits of the Debtors’ tax identification numbers are: InFlow LLC (9489); Sungard AS New Holdings, LLC (5907); Sungard AS New Holdings II, LLC (9169); Sungard AS New Holdings III, LLC (3503); Sungard Availability Network Solutions Inc. (1034); Sungard Availability Services (Canada) Ltd./Sungard, Services de Continuïte des Affaires (Canada) Ltee (3886); Sungard Availability Services Holdings (Canada), Inc. (2679); Sungard Availability Services Holdings (Europe), Inc. (2190); Sungard Availability Services Holdings, LLC (6403); Sungard Availability Services Technology, LLC (9118); Sungard Availability Services, LP (6195); and Sungard Availability Services, Ltd. (4711).

<sup>2</sup> *Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Sungard AS New Holdings, LLC and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 763] (the “**Plan**”).

*Rule of Bankruptcy Procedure 9024 Approving the Retention and Compensation Applications of Jackson Walker LLP, (2) Sanctions, and (3) Related Relief* [Docket No. 1043] (the “**Motion**”) filed by Kevin Epstein, United States Trustee for Region 7 (the “**U.S. Trustee**”).

As set forth in the *Notice of Standing and/or Indispensable Party Status* [Docket No. 1053] filed in the Sungard Chapter 11 Cases, since the Plan’s Effective Date, the Debtors have continued in existence as Wind-Down Debtors for purposes of, *inter alia*, liquidating any assets held by the Wind-Down Debtors after the Effective Date. Under the Plan, “Causes of Action” belonging to the Debtors were expressly preserved and vested in the Wind-Down Debtors. Through this Joinder, the Wind-Down Debtors join and adopt the relief sought in the Motion, including the allegations, arguments, and pleadings made and/or filed by the U.S. Trustee in support thereof, to the extent of seeking (a) to vacate the orders approving the retention and compensation of Jackson Walker LLP as Debtors’ counsel, and (b) disgorgement of fees and expenses paid to Jackson Walker in the Sungard Chapter 11 Cases.

Dated: December 16, 2024

**COLE SCHOTZ P.C.**

/s/ Daniel F.X. Geoghan

Daniel F.X. Geoghan (Texas Bar No. 24126280)  
901 Main Street, Suite 4120  
Dallas, TX 75202  
Telephone: (469) 557-9390  
Email: dgeoghan@coleschotz.com

- and -

Mark Tsukerman  
1325 Avenue of the Americas, 19th Floor  
New York, NY 10019  
Telephone: (212) 752-8000  
Email: mtsukerman@coleschotz.com

*Counsel to the Wind-Down Debtors in the Sungard Chapter 11 Cases*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 16, 2024, the foregoing Joinder was served upon all parties that are registered or otherwise entitled to receive electronic notices via electronic notification pursuant to the CM/ECF system for the United States Bankruptcy Court.

/s/ Daniel F.X. Geoghan  
Daniel F.X. Geoghan